



November 10, 2009

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The Honorable Chairman and Members of the
Hawaii Public Utilities Commission
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Honolulu, Hawaii 96813

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PUBLIC UTILITIES
COMMISSION

Subject: Docket No. 2009-0108
Proposed Amendments to the IRP Framework
Information Requests

Pursuant to the Order Approving the Stipulated Procedural Order, as Modified, filed on September 23, 2009, attached are the Hawaiian Electric Companies' information requests ("IRs") to the other Parties on their preliminary statements of position, filed on October 2, 2009, in the subject proceeding.

Sincerely,

Attachments

cc: Service List

Docket No. 2009-0108
Investigating Proposed Amendments to the Framework for Integrated Resource Planning

Hawaiian Electric Companies
Information Request on
Counties of Hawaii, Kauai, and Maui
Preliminary Statement of Position

HECO/Counties-IR-1

Ref: Governing Principle #3

On page 6, the Counties propose that “Rate and fee designs are specified as demand-side options...so that each utility’s rate and fee pricing structures can be designed to complement the development of technology-based demand-side options.”

- a. Please elaborate on what “demand-side options” are being referred to.
- b. How will the role of the public benefits fee administrator fit into this proposal if demand-side options include energy efficiency programs?

HECO/Counties-IR-2

Ref: Governing Principle #4

On page 7, the Counties propose that “Integrated resource plans shall give consideration to...an estimation of externality values from consumer and community ‘willingness-to-pay’ perspectives.” The Counties further state on page 8 that “the Counties propose the monetization of the externalities associated with various resource portfolio/scenarios by measuring various stakeholders’ ‘willingness-to-pay’. For example, take two resource portfolios/scenarios with the only difference between the two being the location of similar wind farms.” Please elaborate on the following:

- a. If the monetization of the externalities is based on a specific location of the resource, how will the requirements of the Competitive Bidding Framework be integrated? Is it the Counties intent that the Request for Proposal for a competitively bid resource be location specific?
- b. How long do the Counties believe it would take to survey stakeholders on their “willingness-to-pay”? How would this effort affect the overall planning process timeline?
- c. How will location, as a single variable in the example cited by the Counties, be factored into a “willingness-to-pay” measurement if specific attributes such as the location of a generating unit will be determined by bids received and evaluated on an RFP process to acquire new generation?

HECO/Counties-IR-3

Ref: Governing Principle #6

On page 9, the Counties proposed that the existing Governing Principle #6 be expanded to require that “The IRP process must go beyond providing opportunities for public participation by improving the accommodation of legitimate resource options proposed by Advisory Group members. Accordingly, the Counties propose the analysis and modeling of at least five resource portfolios/scenarios recommended by the Advisory Group.” Please explain the following:

- a. What criteria would be used to determine “legitimate resource options”?

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- b. What is the total number of scenarios (including those proposed by the Advisory Group) envisioned or assumed by the Counties in their suggestion for the analysis and modeling of at least five resource portfolios/scenarios recommended by the Advisory Group?
- c. Is it the Counties intent that the entire Advisory Group must come to a consensus on which five resource portfolios/scenarios are to be analyzed by the utility? If the Advisory Group cannot come to a consensus and has more than five scenarios that they want analyzed, is the utility required to analyze all the scenarios?
- d. How long do the Counties expect the process of analyzing “at least five resource portfolios/scenarios” to entail and how would it impact the overall planning process cycle timeline?

HECO/Counties-IR-4

Ref: Proposed Change to IRP Framework – Interim Filing

On pages 11 and 12, the Counties propose that each utility prepare an interim IRP filing for review and approval by the Commission. The Counties further add on page 12 that the interim review process is expected to be mitigated by the Counties’ proposal to require each utility to analyze and model at least five resource portfolios/scenarios recommended by the Advisory Group.

- a. Please elaborate on what is to be provided in the interim IRP filing.
- b. Please describe the intended standing of an interim IRP filing that is approved by the Commission?
- c. What happens if the Commission does not approve an interim IRP filing?
- d. Please describe the impact of either decision on the time it would take to perform an IRP from beginning to final decision by the Commission.

HECO/Counties-IR-5

Ref: NRRI Comments – III. Who Are the Appropriate Participants in a CESP Process

On page 10, NRRI envisions many participants in the CESP process and states “With this diversity of participants, a neutral facilitator seems necessary.” If the HECO Companies were to propose in the CESP Framework that the CESP process would have a neutral facilitator (similar to the role of an Independent Observer under the Framework for Competitive Bidding) leading all Advisory Committee meetings, public hearings, and observing the utilities’ technical analyses, would that be an acceptable means for addressing the concerns over public participation and transparency in the CESP process?

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Hawaiian Electric Companies
Information Request on
Haiku Design and Analysis
Preliminary Statement of Position

HECO/HDA-IR-1

Ref: Specific Functions Served by the Utility Planning Process

On page 5, HDA states that “The utility planning process should assist the Commission in addressing several specific regulatory needs.... Although these regulatory determinations would, for the most part, not be resolved explicitly in the utility planning process, the planning process should be explicitly designed to serve these functions.” HDA continues by listing specific functions on pages 5 and 6 that are also listed in Attachment A on page 3. On page 5 of Attachment A, HDA states that “plans must be flexible and somewhat general”.

- a. Please discuss how “establishing, evaluating, maintaining and determining the reasonable pricing of tariffs designed to encourage acquisition of renewable resources (such as feed-in tariffs, net energy metering and standby charges)” would be accomplished in the planning process with plans that strive to be “flexible and somewhat general”.
- b. Please discuss how “determining short run and long run utility avoided costs and the reasonableness of wholesale payment rates that may be above ‘least’ avoided cost” would be accomplished in the planning process with plans that strive to be “flexible and somewhat general”.
- c. Please discuss how “modification of the RPS and EEPS” would be accomplished in this planning process. For example, are the energy efficiency DSM programs to be evaluated and determined in the planning process? Are energy efficiency DSM programs predetermined based on set budgets for the PBF Administrator which would be used as inputs to the IRP process? Or would the IRP process determine the key attributes of the energy efficiency DSM programs (such as MW load reduction at various hours of the day, MWh of energy reduction by year over multiple years)?

HECO/HDA-IR-2

Ref: NRRI Comments – III. Who Are the Appropriate Participants in a CESP Process

On page 10, NRRI envisions many participants in the CESP process and states “With this diversity of participants, a neutral facilitator seems necessary.” If the HECO Companies were to propose in the CESP Framework that the CESP process would have a neutral facilitator (similar to the role of an Independent Observer under the Framework for Competitive Bidding) leading all Advisory Committee meetings, public hearings, and observing the utilities’ technical analyses, would that be an acceptable means for addressing the concerns over public participation and transparency in the CESP process?

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Hawaiian Electric Companies
Information Request on
Life of the Land
Statement of Position

HECO/LOL-IR-1

Ref: Proposed Changes

On pages 12 through 17, LOL sets forth a “Proposed IRP-2,” which appears to be a new planning framework to replace the current IRP Framework. Item 2, on page 12, states “the Commission shall open a single IRP-2 docket to cover HECO, MECO, and HELCO’s planning process.” Please elaborate on what is expected to occur under “a single IRP-2 docket”; i.e., one plan for all three systems or each system to have a plan of their own but for the three IRPs to be conducted simultaneously.

HECO/LOL-IR-2

Ref: NRRI Comments – III. Who Are the Appropriate Participants in a CESP Process

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Docket No. 2009-0108
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Hawaiian Electric Companies
Information Request on
JW Marriott Ihilani Resort & Spa, Waikoloa Marriott Beach Resort & Spa,
Maui Ocean Club, Wailea Marriott, and
Essex House Condominium Corporation on
Behalf of Kauai Marriott Resort & Beach Club
Preliminary Statement of Position

HECO/Marriotts-IR-1

Ref: NRRI Comments – III. Who Are the Appropriate Participants in a CESP Process

On page 10, NRRI envisions many participants in the CESP process and states “With this diversity of participants, a neutral facilitator seems necessary.” If the HECO Companies were to propose in the CESP Framework that the CESP process would have a neutral facilitator (similar to the role of an Independent Observer under the Framework for Competitive Bidding) leading all Advisory Committee meetings, public hearings, and observing the utilities’ technical analyses, would that be an acceptable means for addressing the concerns over public participation and transparency in the CESP process?

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Hawaiian Electric Companies
Information Request on
Hawaii Renewable Energy Alliance
Preliminary Statement of Position

HECO/HREA-IR-1

Ref: Governing Principles – Overall Plan

On page 12, HREA proposes that there be one plan for each island utility to address how each island can meet state energy goals, and an overall plan for the island chain. HREA also states that it supports "...the preparation of an island-wide plan for HECO and, if appropriate, including KIUC." Please clarify if the "island-wide plan for HECO" is different than the proposed overall plan for the island chain. In addition, please clarify who will be responsible for development of the proposed overall plan for the island chain, and if it is intended that the proposed overall plan takes precedence over the IRP for each island utility.

HECO/HREA-IR-2

Ref: NRRI Comments – III. Who Are the Appropriate Participants in a CESP Process

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Docket No. 2009-0108
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Hawaiian Electric Companies

Information Request on
Department of Business, Economic Development and Tourism
Opening Statement of Position

HECO/DBEDT-IR-1

Ref: Proposed Changes to the IRP Framework, Item 3

On page 11, DBEDT states that the “framework must include clear provisions or principles on requirements or expectations of utility compliance to the framework, as well as consequences of, and procedures for, deviations from the framework in whole or in part.” Please elaborate on what DBEDT is expecting as requirements, consequences, and deviations by providing examples.

HECO/DBEDT-IR-2

Ref: Proposed Changes to the IRP Framework, Item 4

On pages 11 to 12, DBEDT states that “The framework should establish and set the objectives of the utilities’ resource planning and resource plans, and specify the means for measuring the effectiveness of the plans in achieving the stated objectives.” Please elaborate on how DBEDT is envisioning the effectiveness of the plans would be measured.

HECO/DBEDT-IR-3

Ref: Proposed Changes to the IRP Framework, Item 9

On page 13, DBEDT proposes that the new resource planning framework be “more open and transparent, and must include provisions to encourage and accommodate actual public participation and public input in the resource planning process....Given the utility resource plans’ broad policy implications and the impact on the State energy goals, the new resource planning framework must ensure a collaborative planning process.”

- a. Please elaborate on how the process can be “more open and transparent”.
- b. Please explain what “actual public participation” is and how the planning process is to “accommodate” it.
- c. Please elaborate on what is expected to be the result of a “collaborative planning process”. Is DBEDT expecting the entire Advisory Committee and public to reach consensus on the “broad policy implications and the impact on the State energy goals”?

HECO/DBEDT-IR-4

Ref: Public Benefits Fee Administrator Role, Item 2

On page 20, DBEDT proposes that “within the new resource planning framework a clear delineation of what programs should be managed, administered, developed, and implemented by the public benefits fee administrator and which programs should remain under the utilities’ control, as well as which programs the two entities (i.e., PBF administrator and the utilities) may jointly implement and administer in a collaborative fashion.” Please clarify whether this delineation is to be determined and made part of the CESP Framework or within the process of conducting the CESP planning cycle.

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HECO/DBEDT-IR-5

Ref: NRRI Comments – III. Who Are the Appropriate Participants in a CESP Process

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Docket No. 2009-0108
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Hawaiian Electric Companies
Information Request on
Blue Planet Foundation
Preliminary Statement of Position

HECO/Blue Planet-IR-1

Ref: NRRI Comments – III. Who Are the Appropriate Participants in a CESP Process

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Docket No. 2009-0108
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Hawaiian Electric Companies
Information Request on
Division of Consumer Advocacy
Preliminary Statement of Position

HECO/DCA-IR-1

Ref: Public-Only Factors Scenario

On page 15, the Consumer Advocate "... recommends that the CESP Process should incorporate the idea that at least one scenario should represent a product that is determined solely by non-utility parties." Further, "[T]he parties, other than the utility company, would be responsible for working together to reach consensus on the necessary inputs into a scenario and the utility company would then perform the necessary modeling work to generate the scenario." Please confirm that the parties, other than the utilities, would be responsible for the necessary inputs at their own cost, and whether it is envisioned that there would be some advanced agreement as to the consistency of the inputs in order for subsequent utility modeling to occur smoothly.

HECO/DCA-IR-2

Ref: NRRI Comments – III. Who Are the Appropriate Participants in a CESP Process

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Docket No. 2009-0108
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Hawaiian Electric Companies
Information Request on
Hawaii Solar Energy Association
Preliminary Statement of Position

HECO/HSEA-IR-1

Ref: The Need For Clear And Purposeful Planning Objectives and Principles And Transparent Analysis

On page 10, HSEA proposes “additional principles such as: prioritizing and facilitating increased distributed generation over centralized generation; and prioritizing energy resources so that future energy needs are, to the maximum extent possible, met first with energy efficiency and conservation programs, demand response, and renewable energy resources.” Further HSEA states that “clean energy planning also warrants analysis of costs and benefits and a determination of optimum and alternative mixes of resources.”

- a. Please explain the distinction between “distributed generation” and “centralized generation”. For example, in which category would a third-party owned wind farm fall?
- b. Please explain why distributed generation, which could be fossil-fuel fired, should be given a favored status over other supply-side resource options, which could be renewable energy resources or required to reliably integrate more renewable resources, via a Governing Principle?
- c. Please elaborate on how the planning process would determine the “optimum and alternative mixes of resources” if they are prioritized per the proposed additional principles.

HECO/HSEA-IR-2

Ref: Public Participation

On page 17, HSEA proposes that the “Commission should organize the advisory groups and a facilitator independent of the utilities should chair each group.” Please discuss whether it is envisioned that the Commission would develop and use selection criteria for organization of the advisory group, and, if so, what the criteria would be.

HECO/HSEA-IR-3

Ref: Public Participation

On page 17, HSEA proposes that “there should be a rebuttable presumption that the advisory groups’ recommendations – which are based on the expertise of the groups’ members - are justified, and the utilities should bear the burden of overcoming that presumption to justify scenarios or plans at odds with those recommendations.”

- a. Is HSEA proposing that the advisory groups provide all the necessary inputs required for the scenario analysis that the utility would perform?
- b. What are HSEA’s proposed processes to determine whether or not a candidate advisory group member has “expertise” in one or more resource planning topics? Would an advisory group member with expertise in one topic be able to have a “vote” or be able to state a view on another topic in which their expertise has been established?

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- c. Is HSEA willing to share with the utility and other advisory group members project cost data and market potential data to be used in the IRP process?

HECO/HSEA-IR-4

Ref: Public Participation

On page 18, HSEA states its concern that HECO's proposal grants the utilities exclusive responsibility over a wide range of forecasts, analysis, assumptions and other important groundwork for the planning process. HSEA states that the public, including outside experts, and the Commission should be allowed to engage in these aspects of planning to ensure the development of the best information through an open public process. Further, HSEA states that the public, outside experts as well as the Commission would have "no apparent opportunity to provide input in the utilities forecasts..." Is HSEA in favor of reinstituting Advisory Group Technical Committees as was done for HECO's IRP-3 process?

HECO/HSEA-IR-5

Ref: NRRI Comments – III. Who Are the Appropriate Participants in a CESP Process

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Docket No. 2009-0108
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Hawaiian Electric Companies
Information Request on
Kauai Island Utility Cooperative
Preliminary Statement of Position

HECO/KIUC-IR-1

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